

**REMARKS**

Subject to the Examiner's entry of the amendments herein, claims 1-37 are pending in the application. By this Amendment Applicant has amended claims 1, 17, 19 and 24, and added new claims 33-37.

**Claim Rejections Under 35 U.S.C. §102**

The Examiner rejected claims 1, 2, 4, 7, 8, 11, 13, 15, 19-26 and 28-32 under 35 U.S.C. §102(e) as being anticipated by Wagner (U.S. Pub. No. 20030233296).

Wagner System

Wagner describes a system for preparing completed forms using information accessed from a remote database. In the Wagner system it is assumed that the prescribed format of the forms to be completed is predefined prior to initiating the process of completing a given form. Such formats may include, for example, those corresponding to official government forms such as those used by government agencies:

The form generation engine 1 could use the received data to generate any type of forms, for example, official government forms. These forms could be printed locally, or filed with an entity, such as a government agency, over a network.  
[0036]

Additionally, the database could be a form repository holding information concerning various forms. The information held in the form repository could include the form layout, the information fields required by the form, or the form itself, for example.  
[0030]

Because the layout and other attributes of the forms used in the Wagner system are predefined, the Wagner system does not include any mechanism for enabling a user to define the layout of a form by, for example, affirmatively selecting, specifying or identifying various available page or field types during the process of designing a report file subsequently used to generate a report.

The Wagner system does not in any way facilitate the design of a report file used in report generation. Instead, within the Wagner system a completed form is generated in accordance with a predefined form layout by retrieving data from a remote database and

inserting it into fields or locations specified by the predefined form. For example, Wagner describes the process of generating a completed tax form using a predefined tax form layout provided by the Internal Revenue Service IRS:

[0074] An example of an application of this system according to one embodiment of the invention is illustrated in FIG. 8. Referring to FIG. 8, a method for retrieving tax data from the IRS and generating IRS forms and state forms is described. ...

[0077] Next, as shown in step 804, a tax form corresponding to the relevant information is generated. Preferably, the filtered data would be presented in a format which would match the prescribed form. The entire form could be generated by the system in a prescribed format including the relevant data.

In short, Wagner is concerned with addressing the problem of retrieving information from a remote database and arranging the retrieved information in a format prescribed by a predefined form, such as a tax return, in order to generate a completed form based upon the retrieved information. Wagner's use of predefined formatting information to generate completed forms obviates the need to facilitate the design report files used in report generation, and Wagner in fact provides no such design capability.

#### System of the Invention

In general terms the present invention relates to a method of designing a report file used for automatic report generation as well as to a report generation method utilizing such a report file. The inventive method of designing a report file includes enabling a user to specify a structure of the report file by defining a first report group comprised of one or more page definitions. The first report group may be of a first group type selected by the user from among a plurality of predefined group types. The user may also specify that the report file associate a first data source with the first report group. The method of designing the report file also permits a user to identify one or more fields for inclusion within each of the one or more page definitions. In addition, the user may specify an association between content from the first data source and each of the one or more fields.

In one embodiment the system of the invention enables the automated creation of reports in the Portable Document File (i.e., "PDF") format based upon the contents of database 132. The

inventive automated report building process obviates the need for tedious, time-consuming manual coding of customized report writer routines and thereby facilitates efficient, cost-effective report production.

Differences Between the System of the Present Invention and the Cited Reference

A primary difference between the inventive system and the system described by Wagner is that the Wagner system does not utilize, or enable a user to design, report files of the type contemplated by the present invention. This is largely because the Wagner system is directed to generating completed forms in accordance with predefined form layouts (e.g., standardized tax return form layouts), and does not provide the user with the capability to design such layouts. In contrast, the system of the invention provides the user with the opportunity to design a form by, for example, selecting from among various report groups comprised of various page definitions and identifying fields for inclusion within such page definitions. Although a user of the Wagner system may request that a form of given predefined type (e.g., a tax return form) be populated with information from a database, the Wagner system does not provide the user with the opportunity to design a form in the manner contemplated by the invention.

Applicant appreciates the Examiner's addressing of many of Applicant's arguments in the above-referenced Office Action. However, Applicant respectfully submits that the Examiner has not responded to the Applicant's arguments in the preceding paragraph. In particular, Applicant respectfully submits that the Examiner has not demonstrated in what manner Wagner facilitates designing a report file used for report generation, as is contemplated by certain of the pending claims. The Examiner appears to be inferring that if the Wagner system inherently or otherwise includes something akin to the claimed "report file" that defines pages, fields, field properties, etc., then it follows that Wagner describes designing such a file by "specifying a structure of the report file ...", "associating a first data source", "identifying one or more fields", and "specifying an association" as presently claimed. As an initial matter Applicant disagrees with the Examiner that the Wagner system includes a "report file" as defined by the pending claims. However, even if Wagner does include such a report file, it does not necessarily follow that Wagner describes a method of designing such a report file. In this regard none of the

sections of Wagner cited by the Examiner relate to the affirmative acts which would be carried out in designing a report file consistent with the invention as presently claimed. For example, the portions of Wagner relied upon by the Examiner as allegedly corresponding to the claimed “specifying a structure of the report file by defining a first report group” (i.e., p. 3, para. 43, 45, 46; p. 6, para. 72, 73), fail to suggest how report file structure could be specified during the process of *designing a report file*. It is irrelevant from the perspective of the pending claims directed to the design of a report file whether or not Wagner’s predefined forms actually include the structure and relationships specified during the claimed design process, since the mere existence of such structure and relationships does not in any way suggest a method by which a report file could be *designed* to embody such structure and relationships. Applicant is unable to discern any teaching in Wagner relating to a process for designing or creating a report file, and respectfully submits that any structure or relationships inherent with the predefined forms of Wagner does not suggest such a design or creation process. Accordingly, Applicant respectfully submits that the Examiner has failed to make a prima facie case supporting the rejection of claims 1-18, since each of these claims include elements directed to the design or creation of a report file.

With respect to the rejection of claim 1 in the above Office Action, the Examiner indicates that Wagner describes the claim element of “specifying a structure of the report file by defining a first report group comprised of one or more page definitions, the first report group being of a first group type selected from among a plurality of predefined group types”, since Wagner teaches “configuring the report in a specific format determined by the group and the page definitions with the group being a type of tax return and the definitions being the information to include”. Applicant again respectfully submits that a user of the Wagner system does not in any way specify a structure of a report file by defining a first group comprised of one or more page definitions, where the user selects from among a plurality of predefined group types. None of the sections of Wagner relied upon by the Examiner describe these claimed affirmative acts of “specifying” and selecting” performed during the report file design process. Rather, in the Wagner system the user merely indicates which of one or more predefined forms it is desired to populate with information from a database. Specifically, Wagner provides no

mechanism to enable a user to specify a report structure by, among other things, selecting from a plurality of predefined group types. Applicant again respectfully submits that it is necessary to point out the operations within the Wagner system corresponding to those of the claimed invention, and it is insufficient to assert that various similarities between Wagner's predefined form layout information and the result of the method of claim 1 (i.e., a report file definition) suggest or require that the intermediary acts (e.g., selecting, identifying, specifying, etc.) are performed during the design process in the claimed manner.

Turning again to the specifics of the rejection of claim 1, the Examiner asserts that Wagner teaches that the IRS database may be associated with a federal tax return and that this corresponds to the claimed "associating a first data source with the first report group" Applicant respectfully submits that the portion of Wagner cited in this regard (i.e., p. 2, para. 34, p. 3, para. 41, 45 and p.6, para. 70) fail to describe or suggest association of a data source with a report group or even the association of the IRS database with a tax return. Rather, these sections of Wagner merely describe the manner in which Wagner's "data acquisition module 102" retrieves data from a remote database, such as the IRS database. No "association" is established within the Wagner system between the IRS database and either an individual tax return or predefined form. Moreover, Wagner's "form generation engine 1" does not query any remote databases, such as the IRS database, during generation of reports, but merely pulls information from database 3. Since the generation engine 1 only pulls information from the database 3 during the generation of reports, Applicant respectfully submits that Wagner teaches away from creating associations between data sources and report groups either within the context of Wagner's predefined forms or otherwise.

Notwithstanding the failure of the Wagner reference to describe a number of the aspects of the invention described herein, in order to advance prosecution of the application the Applicant has amended claims 1, 17, 19 and 24 to recite that a data source to be associated with a report group is selected from among multiple available data sources. An embodiment of this aspect of the present invention is described at page 15 of the present specification:

FIG. 12 is a screen shot illustrating a window enabling a user to select either a predefined or a user-defined data source. In the case where the available predefined data sources are not suitable, the ReportDesigner retrieves a list of previously-created user-

defined data sources and displays these to the user. This is illustrated by the screen shot of the window 1300 of FIG. 13, which presents such a list of previously-created user-defined data sources (or, equivalently, user-defined functions or "UDFs") and prompts the user to make a selection.

As discussed above, the Wagner system does not permit the affirmative selection of a particular data source during the design of a report file used for report generation. Wagner also does not contemplate that a plurality of data sources are available to be associated with components of such a report file, and certainly provides no facility enabling users to select from among such plural sources.

For the sake of brevity Applicant herein incorporates by reference Applicant's arguments made in the Response to Office Action dated July 20, 2006 with respect to the remaining elements of claim 1 and the other claims pending in the present application.

Accordingly, Applicant respectfully requests reconsideration of the outstanding rejection of independent claim 1, and associated dependent claims 2 and 4 under 35 U.S.C. §102(e) as being anticipated by Wagner. Given the similarity of recitations in independent claim 1 to those in independent claim 7, Applicant further requests consideration of the outstanding rejection of independent claim 7, and associated dependent claims 8, 11, 13 and 15 under 35 U.S.C. §102(e) as being anticipated by Wagner.

Claim 19 has been amended similarly to claim 1. Accordingly, Applicant also respectfully requests reconsideration of the outstanding rejection of independent claim 19, and associated dependent claims 20-23, under 35 U.S.C. §102(e) as being anticipated by Wagner.

Claim 24 has been amended similarly to claim 1. Accordingly, Applicant respectfully requests reconsideration of the outstanding rejection of independent claim 24, and associated dependent claims 25-26 and 28, under 35 U.S.C. §102(e) as being anticipated by Wagner.

The Examiner has rejected claim 29 since it "reflects the report file for performing the operations of claims 1, 8 and 24 and is rejected along the same rationale since Wagner teaches multiple data source in Figures 1a and 1b. As mentioned above, although the database 3 of Wagner may be supplied with information from multiple sources, Wagner describes no means for establishing an association between such sources and respective portions of a report file. In fact, Wagner teaches away from establishing any such association by permitting the report

generator 1 to interface only with the database 3, and not with any other "associated" data sources. Applicant thus requests reconsideration of the of the outstanding rejection of independent claim 29, and associated dependent claims 30-32, under 35 U.S.C. §102(e) as being anticipated by Wagner.

In the above Office Action the Examiner has rejected dependent claims 3, 5-6, 9-10, 12, 14, 16-18, and 27 under 35 U.S.C. §103(a) as being unpatentable over Wagner in view of various other references. Because such other references do not address any of the deficiencies of Wagner discussed above with respect to the pending independent claims, Applicant also respectfully requests reconsideration of the outstanding rejection of dependent claims 3, 5-6, 9-10, 12, 14, 16-18, and 27.

Applicant has added new claims 33-37 in order to highlight certain features of the present invention. In particular, these new claims contemplate selection of a data source from among multiple user-defined data sources as part of the process of designing a report file.

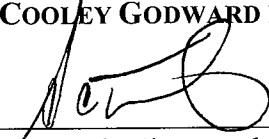
Applicant respectfully requests consideration of the remarks herein prior to further examination of the above-identified application. The undersigned would of course be available to discuss the present application with the Examiner if, in the opinion of the Examiner, such a discussion could lead to resolution of any outstanding issues.

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Respectfully submitted,  
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